

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

MAY 16 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

JIAN RONG ZHANG
YIN XIAO REN
JACKY SHI
CHENG WEI ZHANG
YIHUI LIN

§
§
§
§
§
§
§
§

18CR277

FILE UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES:

Beginning from on or about February 2014 until on or about February, 2018,
within the Southern District of Texas and elsewhere, the defendants,

**JIAN RONG ZHANG
YIN XIAO REN
JACKY SHI
CHENG WEI ZHANG
YIHUI LIN**

did knowing and in reckless disregard of the fact that aliens, listed in Counts One, Two, Three, Four and Five, below, had come to, entered, and remained within the United States in violation of law, conceal, harbor, and shield from detection such aliens, in any place, including any building, for the purpose of commercial advantage and private financial gain.

COUNT ONE: Bernabe Lopez-Lopez

COUNT TWO: Felipe Garcia Ordonez

COUNT THREE: Sebastian Garcia Tzoc

COUNT FOUR: Walter Garcia

COUNT FIVE: Felix Romeo Garcia

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

COUNT SIX

(False Swearing in an Immigration Matter)

Beginning from on or about January, 2016, in the Houston Division of the Southern District of Texas,

**YIN XIAO REN
JACKY SHI**

defendants herein, did knowingly subscribe as true, a false statement, with respect to a material fact in an application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, to wit: the defendants did falsely represent in an I-751 Application to Remove Conditions of Permanent Residence Status and supporting Petition for Alien Relative (I-130) and Biographic Information (G-325A) filed with the Citizenship and Immigration Service (CIS): that

they were living together as husband and wife, when in fact they then and there knew that they had never, cohabitated.

In violation of Title 18 United States Code, Section 1546(a).

NOTICE OF FORFEITURE

(18 U.S.C. § 982(a)(6); 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c))

The United States gives notice to defendants,

**JIAN RONG ZHANG
YIN XIAO REN
JACKY SHI
CHENG WEI ZHANG
YIHUI LIN**

that in the event of conviction of any of the offenses charged in Counts One through Five of this Indictment, the following property is subject to forfeiture:

- (1) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);
- (2) all real and personal property that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);
- (3) all real and personal property that was used to facilitate, or was intended to be used to facilitate, the commission of the offense pursuant to 18 U.S.C. § 982(a)(6); and
- (4) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense, the gross proceeds of such violation, and all

property traceable to such conveyances or proceeds pursuant to 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c).

Property Subject to Forfeiture

Defendants are further notified that the property subject to forfeiture includes, but is not limited to, the following property:

The real property, improvements and appurtenances located on Robinhood Lane, in Angleton, Texas, which is legally described as follows:

Lot 3, Block 4, Chevy Chase Subdivision, Section II, City of Angleton, Brazoria County, Texas, according to the map or plat of recorded in Volume 5, page 287 and amended in Volume 5, page 289 of the plat of records of Brazoria, County Texas.

The record title owners are defendants **YIN XIAO REN** and **JACKY SHI**.

NOTICE OF FORFEITURE
(18 U.S.C. § 982(a)(6))

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice to defendants,

YIN XIAO REN
JACKY SHI

that in the event of conviction of the offense charged in Count Six of this Indictment, the following property is subject to forfeiture:

- (1) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense;
- (2) all real and personal property that constitutes or is derived from or is

traceable to proceeds obtained directly or indirectly from the commission of the offense; and

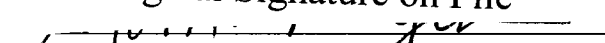
(3) all real and personal property that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

MONEY JUDGMENT AND SUBSTITUTE ASSETS

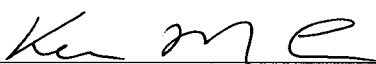
The United States may seek the imposition of a money judgment against the defendants. Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

A TRUE BILL:


Original Signature on File


FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY


Kevin M. Lear
Special Assistant United States Attorney